

# Exhibit B

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<p><b><u>In re Terrorist Attacks on September 11, 2001</u></b>  <b><u>XXX</u></b>  <b><u>XXX</u></b></p> <p style="text-align: center;"><b>PLAINTIFFS,</b></p> <p><b>KINGDOM OF SAUDI ARABIA</b></p> <p style="text-align: center;"><b>DEFENDANT</b></p>	<p><b><u>As relates to: 03 MDL 1570 (GBD)(SN)</u></b></p> <p><b><u>Civil Docket Number:</u></b> _____</p> <p><b><u>SHORT FORM COMPLAINT AND DEMAND FOR TRIAL BY JURY</u></b></p> <p><b><u>ECF CASE</u></b></p>
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**ASHTON SHORT FORM SAUDI ARABIA COMPLAINT**

Plaintiff(s) file(s) this *Ashton Short Form Saudi Arabia Complaint* against Defendant Kingdom of Saudi Arabia by and through the Plaintiff(s) undersigned counsel. Plaintiff(s) incorporate(s) by reference the specific allegations, as indicated below, of the *Ashton* Plaintiffs' Complaint against the Kingdom of Saudi Arabia, 17-cv-2003 Doc. No. 1 in the United States District Court for the Southern District of New York, consolidated with 03 MDL 1570 ("the *Ashton* Saudi Arabia Complaint"). Plaintiff(s) file(s) this *Ashton* Short Form Saudi Arabia Complaint as permitted and approved by the Court's Order of May \_\_\_\_, 2018, ECF No. \_\_\_\_.

**VENUE**

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

**JURISDICTION**

2. Jurisdiction of this *Ashton* Short Form Saudi Arabia Complaint, as asserted in the *Ashton* Saudi Arabia Complaint, is premised upon and applicable to all defendants in this action:

- ☐ 28 U.S.C. § 1605(a)(5) (non-commercial tort exception)
- ☐ 28 U.S. C. § 1605B (Justice Against Sponsors of Terrorism Act)
- ☐ 28 U.S.C. § 1330 (actions against foreign states)
- ☐ Other: set forth below the basis of any additional ground for jurisdiction and plead such in sufficient detail as per the FRCP): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**CAUSES OF ACTION**

3. Plaintiff(s) hereby adopt(s) and incorporate(s) by reference, the *Ashton* Saudi Arabia Complaint as if set forth fully herein.

4. Furthermore, the following claims and allegations are asserted by Plaintiff(s) and are herein adopted by reference from the *Ashton* Saudi Arabia Complaint:

- ☐ First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)
- ☐ First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)
- ☐ Second Cause of Action for Wrongful Death Damages Pursuant to State Tort Law
- ☐ Second Cause of Action for Personal Injury Damages Pursuant to State Tort Law

- ☐ Third Cause of Action for Wrongful Death Damages Pursuant to the Alien Tort Claims Act
- ☐ Third Cause of Action for Personal Injury Damages Pursuant to the Alien Tort Claims Act
- ☐ Plaintiff assert(s) the following additional theories and/or Causes of Action against the Defendants: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

**IDENTIFICATION OF PLAINTIFFS**

5. The following allegations and information are alleged as to each individual who is bringing this claim, as indicated on Appendix 1 to this *Ashton* Short Form Saudi Arabia Complaint; as to each decedent who was injured and who is now deceased, whose claim is brought by the Estate representative; and/or to the survivors of the decedent's Estate; herein referred to as "Plaintiffs."

- a. The citizenship/nationality of Plaintiff is as stated in Appendix 1 to this *Ashton* Short Form Saudi Arabia complaint.
- b. Plaintiff is entitled to recover damages on the causes of action set forth in this *Ashton* Short Form Saudi Arabia complaint.
- c. As indicated at Appendix 1, Plaintiff (i) is the estate representative of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; (ii) is the surviving immediate family member of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; and/or (iii) suffered physical injuries as a result of the September 11, 2001 Terrorist Attacks.
- d. For those plaintiffs with personal injury claims, as indicated in Appendix 1, related to the September 11, 2001 Terrorist Attacks, said Plaintiff was present at the Pentagon and/or the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged, as stated specifically in Appendix 1.

- e. For those plaintiffs with personal injury and/or wrongful death claims, as indicated in Appendix 1, as a direct, proximate and foreseeable result of Defendant's actions or inactions, Plaintiff or his or her decedent suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and/or as described in the *Iran Short Form Complaint*, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged in Appendix 1.
- f. For those plaintiffs with personal injury and/or wrongful death claims, as indicated in Appendix 1, as a direct, proximate and foreseeable result of Defendant's actions or inactions, Plaintiff or his or her decedent suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and/or as described in the *Iran Short Form Complaint*, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged in Appendix 1.
- g. The name, relationship to the injured and/or deceased September 11 victim, residency, citizenship/nationality, and the general nature of the claim for each plaintiff asserting wrongful death and/or personal injury claims is listed on the attached Appendix 1, and is incorporated herein as allegations, with all allegations of the *Ashton* Short Form Saudi Arabia Complaint deemed alleged as to each Plaintiff.

#### **IDENTIFICATION OF THE DEFENDANTS**

6. The following is a Defendant herein:

☐ Kingdom of Saudi Arabia

This *Ashton* Short Form Saudi Arabia Complaint shall be deemed subject to any motion to dismiss the *Ashton* Saudi Arabia Complaint or any other filings responsive to the *Ashton* Saudi Arabia Complaint.

#### **NO WAIVER OF OTHER CLAIMS**

7. By filing this *Short Form Complaint*, Plaintiff(s) is/are not waiving any right to file suit against any other potential defendants or parties.

8. By filing this *Iran Short Form Complaint*, Plaintiff(s) are not opting out of any class that the Court may certify in the future.

**WHEREFORE**, Plaintiff(s) pray(s) for relief and judgment against Defendants as set forth in the *Ashton* Saudi Arabia Complaint as appropriate.

**JURY DEMAND**

Plaintiff(s) hereby demand(s) a trial by jury as to the claims in this action.

Dated: \_\_\_\_\_

Respectfully Submitted,

\_\_\_\_\_  
Counsel for Plaintiff(s)

See Appendix 1 Annexed

**APPENDIX 1 TO THE SHORT FORM COMPLAINT***(EXEMPLAR-ALL NAMES BELOW ARE FICTITIOUS)*

Each line below is deemed an allegation, incorporating the allegations, language and references within the Ashton *Short Form Saudi Arabia Complaint* to which this Appendix is appended, and shall be referenced as Allegation 1 of Appendix 1 to the Ashton *Short Form Saudi Arabia Complaint*, Allegation 2 of Appendix 1 to the Ashton *Short Form Saudi Arabia Complaint*, etc.)

	<b>Plaintiff's Last Name, First Name</b>	<b>Plaintiff's State of Residency at Filing</b>	<b>Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)</b>	<b>Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)</b>	<b>Plaintiff's Citizenship/ Nationality on 9/11/01</b>	<b>9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)</b>	<b>Nature of Claim (wrongful death, solatium, personal injury)</b>
1.	Ames, Mary	CA	Smith, Joanne	Sister	US/US	US/US	Solatium
2.	Green, William	NY	N/A	N/A	US/US	N/A	PI
3.	Boyles, James	MA	Boyles, Caroline	spouse/PR	US/US		WD, Solatium
4.	Kiles, Frank	RI	Richardson, Martha	PR	US/US		WD